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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:23-cr-00192-HZ-1

Plaintiff,

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED
MOTION TO CONTINUE TRIAL
DATE**

v.

JANESSA LYNN HANNIGAN,

Defendant.

I, Ryan Costello, declare:

1. I am the attorney appointed to represent Janessa Lynn Hannigan in the above-entitled case.

2. A jury trial in this case is currently scheduled for November 14, 2023. On June 9, 2023, Ms. Hannigan waived arraignment and trial dates were set. One continuance has been sought by the defense.

3. Ms. Hannigan has received discovery, and the defense is conducting investigation in her case, including obtaining information relating to circumstances of the offense and

Ms. Hannigan's background. This information relates to pretrial litigation, trial, and sentencing. Ms. Hannigan therefore respectfully requests that this Court continue her case for a period of approximately 120 days or more to accomplish these tasks.

4. I have discussed with Ms. Hannigan her right to a speedy trial. She agrees to the continuance and knows it will result in an excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Scott Kerin has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on October 30, 2023, in Portland, Oregon.

/s/ Ryan Costello

Ryan Costello

Assistant Federal Public Defender